

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

<b>BRENT STRAIT</b> <b>1202 Boones Hill Rd., #6</b> <b>Capitol Heights, MD 20743</b>  <b>Plaintiff,</b>  <b>vs.</b>  <b>WASHINGTON METROPOLITAN</b> <b>AREA TRANSIT AUTHORITY</b> <b>600 Fifth Street, N.W.</b> <b>Washington, D.C. 20001,</b>  <b>Defendants.</b>	<b>Civil Action No.:</b>
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**NOTICE OF REMOVAL BY DEFENDANT**  
**WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY (“WMATA”)**

To the Judges of the United States District Court for the District of Maryland:

1. On or about July 14, 2020, Plaintiff filed this action against WMATA’s employee, Christino Best (“Mr. Best”), in the District Court of Maryland for Prince George’s County, in the case titled Brent Strait v. Christino Best, Case No. 0502 0016111 2020.
2. On November 24, 2021, WMATA received a copy of the Writ and Summons and Statement of Claim from its employee, Mr. Best. *See Exhibit A.*
3. On November 29, 2021, WMATA filed a Motion to Dismiss the Complaint against Mr. Best, who was statutorily immune from suit. *See Exhibit B.*
4. On December 1, 2021, Plaintiff filed a Consent Motion to Amend Complaint to Substitute Defendant. *See Exhibit C.*
5. Plaintiff’s Motion to Amend Complaint to Substitute Defendant was granted on December 7, 2021. *See Exhibit D.*

6. A Writ of Summons and Amended Complaint was served on WMATA by certified mail on December 30, 2021. *See* Exhibit E.

7. The attached documents constitute the only process, pleadings, or orders received by the Defendant WMATA in this case. Notwithstanding Plaintiff's request, no Writ of Summons has been issued as to WMATA.

8. This case is a civil action over which the Court has original jurisdiction, pursuant to MD CODE ANN, Transportation Article, §10-204(81), which specifically grants original jurisdiction over suits against WMATA to the United States District Court.

WHEREFORE, Defendant WMATA requests that the entire above-referenced action now pending in the District Court of Maryland for Prince George's County be removed to this Court.

Date: January 28, 2022

Respectfully submitted,

WASHINGTON METROPOLITAN AREA  
TRANSIT AUTHORITY  
By counsel

By: /s/ Donna L. Gaffney  
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**CERTIFICATE OF SERVICE**

I hereby certify that, on January 28, 2022, a copy of the foregoing **Notice of Removal** was mailed and emailed to:

Ryan Frazier, Esq.  
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*Attorney for Plaintiff*

/s/ Donna L. Gaffney  
Donna L. Gaffney